

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

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| <b>IN RE: JOHNSON &amp; JOHNSON TALCUM<br/>POWDER PRODUCTS MARKETING,<br/>SALES PRACTICES, AND PRODUCTS<br/>LIABILITY LITIGATION</b>  | <b>MDL NO. 2738 (FLW) (LHG)</b>       |
| <b>THIS DOCUMENT ALSO RELATES TO:</b><br><br><b>JULIE MACLIN,</b><br><br><b>Plaintiff,</b><br><br><b>v.</b><br><br><b>JOHNSON &amp; JOHNSON, et. al.</b><br><br><b>Defendants</b> | <b>Case No. 3:18-cv-00333-FLW-LHG</b> |

**CERTIFICATION OF JAMES A. MORRIS, JR., RE: MEDICAL  
RECORDS OF DECEDENT PATRICIA ANN JUSTICE**

In compliance with the Court's Order Compelling Production of Medical Records Certification by Discovery Pool Plaintiffs, James A. Morris, Jr., states and declares as follow:

1. I am the attorney for Plaintiff JULIE MACLIN (aka JULIE JUSTICE), individually, and as an Heir at Law, in the above-referenced matter. The facts set forth in this Certification/Declaration are within my personal knowledge and, if called as a witness, I could and would competently testify as follows:

2. Plaintiff JULIE MACLIN is the surviving daughter of decedent Patricia Ann Justice.

3. Starting in and around the middle of June 2020, we sent to Plaintiff the blank Plaintiff Profile Form, along with the authorizations necessary to obtain and produce the core medical records and pathology of her mother Patricia Ann Justice, deceased. Despite numerous follow-ups, Plaintiff was slow to respond.

4. At or around the end of August 2020, Plaintiff did respond, providing us with the information necessary to complete her Plaintiff Profile Form; ascertain the identity of the providers who diagnosed Patricia Ann Justice, deceased, with, and treated her for, ovarian cancer; and obtain the signed HIPAA authorizations allowing us to obtain decedent's relevant medical/pathology records.

5. Core medical, billing, and pathology records for Decedent Patricia Ann Justice were ordered through our copy service Record Grabber on September 3, 2020, from Mark Messing, M.D., and Texas Health Harris Methodist Hospital (HEB).

6. Upon receipt of our order, Record Grabber prepared and submitted the record requests to Dr. Messing and HEB.

7. On September 10, 2020, Record Grabber received an invoice for payment from HEB, and remitted payment the same day.

8. On or about September 14, 2020, Record Grabber confirmed receipt of our record requests from the providers identified above.

9. On or about September 23, 2020, my assistant, by phone and e-mail, attempted to follow up with our representative at Record Grabber for status.

10. On September 24, 2020, Record Grabber responded to my assistant by e-mail and, at that time, advised that HEB was requesting an authorization signed by the decedent's husband, as well as a copy of his driver's license.

11. That same day, we contacted Ms. MACLIN and advised her of the need to obtain her father's authorization and a copy of driver's license no later than the morning of September 25, 2020.

12. Ms. MACLIN contacted my office the morning of September 25, 2020, to advise that she was in the process of obtaining her father's signature on the requisite HIPAA authorization, and a copy of his driver's license and would be forwarding those materials to our office presently.

13. Ms. MACLIN, by e-mail, sent the requisite HIPAA materials to our office, which we immediately forwarded to Record Grabber.

14. While we do not have an exact date of production for decedent's medical records from HEB, we anticipate receiving them in a timely fashion. We will upload them to MDL Centrality immediately upon receipt.

15. Record Grabber has advised us that they are in touch with Dr. Messing's office and are attempting to schedule a date for production of decedent's records. To date, Dr. Messing's office has not provided a date for production of his records.

16. My office has confirmed with Plaintiff that she is not in possession, custody, or control of any of her mother's medical, billing, or pathology records. Accordingly, we have no records to produce at this time, but we are committed to providing them as required by the Court immediately upon receipt.

I declare under penalty of perjury under the laws of the States of California and North Carolina that the foregoing is true and correct.

Executed this 25th day of September, 2020, at Pinehurst, North Carolina.

By:

  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 25, 2020, the above and foregoing CERTIFICATION OF JAMES A. MORRIS, JR., RE: MEDICAL RECORDS OF DECEDENT PATRICIA ANN JUSTICE was filed electronically and is available to viewing through the Court's electronic filing system. A true and correct copy has been served upon all counsel of record via the Court's ECF system.

/s/ James A. Morris, Jr.  
JAMES A. MORRIS, JR.